

EXHIBIT 1

From: [Muneer Ahmad](#)
To: [Pezzi, Stephen \(CIV\)](#); [Rosenberg, Brad \(CIV\)](#); [Westmoreland, Rachael \(CIV\)](#); [Thorp, Galen \(CIV\)](#); [Marutollo, Joseph \(USANYE\)](#)
Cc: [Trudy Rebert](#); [Mayra Joachin](#); [Araceli Martínez-Olguín](#); [Paige Austin](#); [Karen Tumlin](#); [Dasgupta, Anisha](#); [batallavidal_lso@mailman.yale.edu](#); [Finkelstein, Alex](#); [Chien, Marsha \(ATG\)](#); [Taylor, Abigail \(AGO\)](#); [Nogueira, Daniela](#); [Khan, Sania](#); [Colangelo, Matthew](#)
Subject: Re: [Batallavidal_lso] Proposed schedule -- Batalla Vidal v. Wolf (16-cv-4756) and State of New York v. Trump (17-cv-5228)
Date: Thursday, August 13, 2020 10:04:44 AM
Attachments: [BV Proposed Briefing Schedule\[2\].docx](#)

Apologies for the second message. I am adding our State plaintiff colleagues, who were not on the original distribution list.

Muneer I. Ahmad
Sol Goldman Clinical Professor of Law
and Deputy Dean for Experiential Education
Yale Law School
P.O. Box 209090
New Haven, CT 06520-9090
tel. (203) 432-4716
fax (203) 432-1426
email: muneer.ahmad@ylsclinics.org

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From: BatallaVidal_LSO <batallavidal_lso-bounces@mailman.yale.edu> on behalf of Muneer Ahmad <muneer.ahmad@ylsclinics.org>
Date: Thursday, August 13, 2020 at 8:56 AM
To: "Pezzi, Stephen (CIV)" <Stephen.Pezzi@usdoj.gov>, "Rosenberg, Brad (CIV)" <Brad.Rosenberg@usdoj.gov>, "Westmoreland, Rachael (CIV)" <Rachael.Westmoreland@usdoj.gov>, "galen.thorp_usdoj.gov" <galen.thorp@usdoj.gov>, "Marutollo, Joseph (USANYE)" <Joseph.Marutollo@usdoj.gov>
Cc: Trudy Rebert <rebert@nilc.org>, Mayra Joachin <Joachin@nilc.org>, Araceli Martínez-Olguín <martinez-olguin@nilc.org>, Paige Austin <paige.austin@maketheroadny.org>, Karen Tumlin <karen.tumlin@justiceactioncenter.org>, "batallavidal_lso@mailman.yale.edu" <batallavidal_lso@mailman.yale.edu>
Subject: [Batallavidal_lso] Proposed schedule -- Batalla Vidal v. Wolf (16-cv-4756) and State of New York v. Trump (17-cv-5228)

Dear Counsel,

Attached please find a proposed schedule in the above-referenced cases, made jointly by the *Batalla* *Vidal* and *State of New York* plaintiffs. We would appreciate your views on this schedule in advance of this afternoon's hearing. If it would be helpful to speak by phone, please let us know.

Best wishes,
Muneer Ahmad

Muneer I. Ahmad
Sol Goldman Clinical Professor of Law
and Deputy Dean for Experiential Education
Yale Law School
P.O. Box 209090
New Haven, CT 06520-9090
tel. (203) 432-4716
fax (203) 432-1426
email: muneer.ahmad@ylsclinics.org

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Plaintiffs' Proposed Schedule - *Batalla Vidal v. Wolf* (16-cv-4756) and *State of New York v. Trump* (17-cv-5228)

8/13	Status Conference/PMC
9/10 (28 days)	(1) Plaintiffs' Amended Complaints (2) BV Plaintiffs' Motion for Class Certification (3) Plaintiffs' Motion for Partial Summary Judgment
9/21 (11 days from amended complaints)	Government Production of Administrative Record (AR)
10/5 (14 days from production of AR)	Following conferral with Government, Plaintiffs' motion, if necessary, to complete AR and/or compel extra-record discovery
10/12 (7 days)	Government Opposition to Plaintiffs' motion re. AR/extra-record discovery (if any)
10/8 (28 days from amended complaints)	(1) Government answers/Motion to Dismiss (2) Government Opposition to BV Class Certification motion (3) Government Opposition to Partial SJ/Government Cross-Motion for SJ
10/29 (21 days)	(1) Plaintiffs' Opposition to MTD (2) BV Plaintiffs' Reply on Class Certification (3) Plaintiffs' Reply/Plaintiffs' Opposition to SJ
11/19 (21 days)	(1) Government Reply to MTD (2) Government Reply to Cross-Motion on SJ